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Detroit Edison

Steve Minn, Commissioner  
Minnesota Department of Commerce

**NUCLEAR  
WASTE  
STRATEGY COALITION**



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EIS001210

February 3, 2000

Ms. Wendy R. Dixon, EIS Project Manager  
Yucca Mountain Site Characterization Office  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
P.O. Box 30307, Mail Stop 010  
North Las Vegas, NV 89036-0307

RE: Comments of the Nuclear Waste Strategy Coalition to the  
Draft Environmental Impact Statement for a Geologic Repository for the  
Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca  
Mountain, Nye County, Nevada  
64 Fed Reg. 44200 (August 13, 1999)

The Nuclear Waste Strategy Coalition hereby submits the following comments on the above-referenced U.S. Department of Energy, Draft Environmental Impact Statement.

Sincerely,

Steve Minn  
Commissioner  
Minnesota Department of Commerce, and on behalf of  
The Nuclear Waste Strategy Coalition Executive Committee

Enclosure  
C: Nuclear Waste Strategy Coalition

## UNITED STATES DEPARTMENT OF ENERGY

Draft Environmental Impact Statement for a )  
Geologic Repository for the Disposal of Spent )  
Nuclear Fuel and High-Level Radioactive Waste )  
at Yucca Mountain, Nye County, Nevada )  
64 Fed. Reg. 44200 (August 13, 1999) )

**EIS001210**

Docket: DOE/EIS-0250D

### **COMMENTS OF THE NUCLEAR WASTE STRATEGY COALITION**

#### **INTRODUCTION:**

1...

The Nuclear Waste Strategy Coalition (NWSC) is pleased that the Department of Energy's (DOE) Draft Environmental Impact Statement (DEIS) recommends proceeding with the Proposed Action to construct, operate, monitor, and eventually close a geologic repository for the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain, Nevada. The NWSC notes that the DOE did not identify any potential environmental impacts that would be a basis for not proceeding with the repository. Therefore, we urge the DOE fulfill its obligations and begin removing spent nuclear fuel and high-level radioactive waste from utility plant sites without further delay.

#### **DISCUSSION:**

##### **Overall Costs:**

2

Since enactment of the Nuclear Waste Policy Act of 1982, the nation's ratepayers have paid more than \$16 billion into the Nuclear Waste Fund for DOE to construct, operate and monitor a repository for high-level nuclear waste from commercial power plants across the nation. Thus far, DOE has spent more than \$6 billion of these ratepayer contributions to characterize a geologic repository at Yucca Mountain.

DOE based the DEIS analysis on two alternatives, the Proposed Action Alternative and the No-Action Alternative. DOE estimated additional costs, above and beyond what ratepayers have thus far paid into the Nuclear Waste Fund, for each of these two alternatives.

According to the Proposed Action Alternative, constructing the repository, operating and monitoring it for 100 years, and transporting spent nuclear fuel from plant sites would cost approximately **\$28.8 billion (1998 dollars)**.

The No-Action Alternative included two scenarios. Under the No-Action Alternative Scenario 2, stranding spent nuclear fuel in dry storage casks at plant sites with no effective institutional control after approximately 100 years would cost approximately **\$51.5 billion to \$56.7 billion**, depending on the need to replace the dry storage canisters. Under the No-Action Alternative Scenario 1, stranding spent nuclear fuel in dry storage casks at plant sites with effective institutional control for at least 10,000 years would cost approximately **\$5 trillion**. The high cost is due to the additional **\$480 million to \$590 million per year (1998 dollars)** estimated to be incurred for the remaining 9,900 years of institutional control under Scenario 1.

3...

Therefore, under either Scenario 1 or Scenario 2, the estimated cost of the No-Action Alternative, which ranges from **\$51.5 billion to approximately \$5 trillion**, greatly exceeds the estimated cost of **\$28.8 billion** for DOE to fulfill its obligations. Furthermore, DOE's estimates in the DEIS do not take into account the total costs resulting from the No-Action Alternative. The potential costs of the premature shutdown of nuclear power plants and the consequent loss of 22 percent of the nation's electric supply should also be considered.

3 cont. It would be inconceivable for DOE to pursue a No-Action Alternative and indefinitely strand  
high-level nuclear waste at plant sites at such high cost to the nation's ratepayers and potentially to  
1 cont. the environment. Utility plant sites have not been extensively studied for their suitability to become  
permanent nuclear waste repositories. It is certainly preferable to transport spent nuclear fuel to a  
remote, arid site which is being designed by experts for the purpose of permanent disposal and which  
will be protected by the federal government.

**Transportation Impacts:**

4 The DEIS review of the transportation impacts is thorough and complete, and clearly supports the  
Proposed Action Alternative for moving the spent nuclear fuel and high-level nuclear waste to the  
Yucca Mountain repository. The DEIS review is supported by the practical knowledge that comes  
from more than 3,000 nuclear waste shipments that have been made in this country, and more than  
10,000 radioactive materials shipments that have occurred without a single radiation injury. Any  
determination that would delay or prevent the opening and operation of the Yucca Mountain  
repository due to concerns over the transportation risks, would effectively eliminate any  
transportation of spent nuclear fuel and high-level nuclear waste to any site anywhere in the U.S.,  
because there is nothing unique about transporting these materials to Yucca Mountain, Nevada.

**CONCLUSION**

The NWSC supports the DOE's preferred alternative, as stated in the DEIS, to proceed with  
the Proposed Action to construct, operate, monitor, and eventually close a geologic repository for  
1 cont. the disposal of spent nuclear fuel and high-level radioactive waste at Yucca Mountain, Nevada. On

1 cont.

behalf of its members, the NWSC emphasizes that the longer the delay in DOE's acceptance of nuclear waste from plant sites the greater the burden the utilities and their ratepayers are forced to bear. It is incomprehensible why the Administration continues to delay this program when spent nuclear fuel can be safely transported and stored at a monitored retrievable facility near the Yucca Mountain site, the most scientifically studied piece of land in history. We urge DOE to remove high-level radioactive waste from reactor sites without further delay to prevent unnecessary and duplicative costs to utility customers across the nation.

Respectfully submitted,



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Commissioner  
Minnesota Department of Commerce  
On behalf of the Nuclear Waste Strategy Coalition  
121 7th Place East  
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Dated: February 3, 2000